

## JONES DAY

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**VIA ECF**

June 10, 2022

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 1007

**Re: In re Terrorist Attacks of September 11, 2001, 03 MDL 1570**

Dear Judge Netburn:

Dubai Islamic Bank (“DIB”) and Plaintiffs with claims against DIB (“Plaintiffs”) write to respectfully request a brief modification of the deadlines concerning DIB’s challenge to personal jurisdiction. DIB filed its first motion challenging personal jurisdiction on December 3, 2021. ECF Nos. 7419-7420. The Court thereafter granted several extensions to Plaintiffs’ deadline to respond to DIB’s motion in light of parties’ discussions that the parties had hoped would obviate the need for the Court to decide DIB’s motion. ECF Nos. 7591, 7707, & 7789. Those discussions ended following the release of documents from the U.S. government in March 2022. Following the end of those discussions, the court set a new briefing schedule on April 28, 2022, which included the deadline for DIB’s opening brief of June 17, 2022. ECF No. 7929.

On May 9, 2022, Plaintiffs sent a letter to DIB concerning “supplemental searches for relevant documents.” Plaintiffs take the position that their request for further searches and supplemental document requests are justified in light of the release of information by the U.S. government. DIB believes that discovery is closed and additional searches and requests are unwarranted. Nonetheless, the parties are conferring in an attempt to avoid the need for this Court to resolve such disputes.

As a result, the parties believe that the interests of efficiency and judicial economy are best served if the outstanding discovery issues are resolved before the commencement of briefing on DIB’s personal jurisdiction challenge. Thus, parties seek a brief six-week extension to the briefing schedule to allow parties to complete the ongoing discussions and, if necessary, seek resolution of the discovery issues by this Court. In either circumstance, briefing should commence after the issues concerning additional discovery are resolved.

Accordingly, DIB and Plaintiffs respectfully request that the Court enter an order extending the current briefing dates as follows:

- July 29, 2022: Deadline for DIB to file a new memorandum in support of its personal jurisdiction motion (ECF No. 7419) limited to 30 pages.
- September 14, 2022: Deadline for Plaintiffs to file opposition to DIB's challenge to personal jurisdiction limited to 30 pages.
- October 28, 2022: Deadline for DIB to file its reply in support of its challenge to personal jurisdiction limited to 15 pages.

DIB and Plaintiffs thank Your Honor in advance for the Court's attention to this matter.

Sincerely yours,

/s/ Steven T. Cottreau

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cc: All MDL Counsel of Record (via ECF)